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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC.'S AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL THEIR RESPONSE TO  
WAYMO'S TRIAL BRIEF**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc.’s and  
7 Ottomotto LLC’s Administrative Motion to File Under Seal Their Response to Waymo’s Trial Brief  
8 (the “Administrative Motion”). The Administrative Motion seeks an order sealing highlighted  
9 portions of Defendants’ Response to Waymo’s Trial Brief (“Uber’s Response”), as well as the entirety  
10 of Exhibit 5 thereto.

11 3. The portions of Uber’s Response and Exhibit 5 identified below contain or refer to  
12 trade secret information, which Waymo seeks to seal.

13 4. Uber’s Response (portions marked in red boxes in version filed herewith) and Exhibit 5  
14 (entire document) contain, reference, and/or describe Waymo’s asserted trade secrets, including as  
15 misappropriated by Defendants, or information that, from context, tends to disclose Waymo’s asserted  
16 secrets. The information Waymo seeks to seal includes the confidential design and functionality of  
17 Waymo’s proprietary autonomous vehicle system, including its technical specifications and/or LiDAR  
18 designs, which Waymo maintains as secret. I understand that these trade secrets are maintained as  
19 secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-  
20 31). The public disclosure of this information would give Waymo’s competitors access to  
21 descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such  
22 information were made public, I understand that Waymo’s competitive standing would be  
23 significantly harmed.

24 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Response and  
25 Exhibit 5 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on February 2, 2018.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7  
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.

11  
12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven